

UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

United States of America
v.
Akeem W. First (xx-xx-1996)

Case No. 21-862M(NJ)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 26, 2021 in the county of Milwaukee in the
Eastern District of Wisconsin, the defendant(s) violated:

Code Section

Offense Description

Title 18, United States Code,
Section 922(g)(1)

Possession of a firearm by a felon

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

 1258
Complainant's signature

Michael Seeger, Racine PD, Investigator

Printed name and title

Sworn via telephone; transmitted via email
pursuant to Fed. R. Crim. 4.1

Date: March 30, 2021


Judge's signature

City and state: Milwaukee, Wisconsin

Honorable Nancy Joseph

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Michael Seeger, being first duly sworn, hereby depose and state as follows:

I. BACKGROUND, TRAINING, AND EXPERIENCE

1. I have been employed as an investigator with the Racine Police Department (RAPD) since May 2008. I am currently assigned to the Special Investigations Unit- Drug Enforcement. As such, I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code, in that I am empowered by law to conduct investigations of and to make arrests for federal felony offenses.

2. I have participated in numerous narcotics investigations which involved violations of state and federal controlled substances including Title 21, United States Code, Sections 841(a)(1) and 846 (possession with intent to distribute a controlled substance and conspiracy to possess with intent to distribute a controlled substance), and firearms related offenses, including Title 18, United States Code, Section 922(g)(1). I have been involved with various electronic surveillance methods, the debriefing of defendants, informants, and witnesses, as well as others who have knowledge of the distribution, transportation, storage and importation of controlled substances. I have participated in the execution of multiple state and federal search warrants.

3. I have received training in the area of narcotics investigations, money laundering, and various methods that drug dealers use in an effort to conceal and launder the proceeds of their illicit drug trafficking enterprises. I have participated or assisted in numerous federal and state search warrants for narcotics related offenses, which have resulted in the seizure of United States currency, vehicles, and jewelry from individuals involved in narcotic trafficking.

4. I have authored and/or aided in investigations that have led to the issuance of numerous search warrants involving violations of both state and federal narcotics and firearms

laws. These warrants involved the search of locations including: residences of targets, their associates and relatives, “stash houses” (houses used as drug/money storage locations), storage facilities, safe boxes, cellular/camera phones. Evidence, searched for, and recovered in these locations has included controlled substances, firearms, records pertaining to the expenditures and profits realized therefrom, monetary instruments, and various assets that were purchased with the proceeds of the drug trafficking.

II. PURPOSE OF AFFIDAVIT

5. This affidavit is being submitted in support of a criminal complaint for Akeem W First, for possession of a firearm by a felon, in violation of Title 18, United States Code, Section 922(g)(1).

6. The statements in this affidavit are based on my personal knowledge, and on information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that in the State and Eastern District of Wisconsin, and elsewhere Akeem W First was in possession of a firearm by a convicted felon, in violation of Title 18, United States Code, Section 922(g)(1).

II. PROBABLE CAUSE

7. On March 26, 2021, case agents received information from a reliable confidential informant (CI) that “Akeem” was getting a haircut at the barbershop near Kinzie and Arthur Avenue and had a handgun. According to the CI, “Akeem” was wearing a green jogging suit and was driven to the barbershop by his girlfriend, “Asia.”

8. Case agents were previously aware of First because of his previous drug-trafficking activities in the Racine area as well as his unique name. Additionally, the CI had previously discussed First's drug trafficking activities with case agents and conducted controlled buys of controlled substances from First in late 2020.

9. Case agents believe that the information supplied by the CI is reliable because the CI has previously provided information about on-going criminal activity to the Racine Police Department, Special Investigations Unit that has resulted in at least 11 felony arrests in the past 24 months. The CI has also provided information regarding at least 4 other drug dealers in the City of Racine that your affiant has been able to verify through further investigations and other sources. Case agents are not aware of any instances in which the CI was found to be untruthful. The CI is cooperating in exchange for compensation. The CI has previously been convicted of manufacture / deliver cocaine < 1 gram (2 counts), possession of THC-2nd, and possession of THC.

10. Based on publicly available information, case agents are aware that Serriah's Beauty Salon, 3500 Kinzie Avenue, Racine, Wisconsin, is at the corner of Kinzie and Arthur Avenue in the City of Racine. Based on prior discussions with the CI, case agents believe that "Akeem" is Akeem First. Based on publicly available information, case agents are aware that First is a convicted felon. Based on discussions with the CI, case agents are also aware that First is currently dating D'Asia McCray.

11. Based on publicly available information, case agents are aware that First has the following felony convictions in the State of Wisconsin: a) in 2013, First was convicted of felony possession with intent to deliver THC in Racine County Circuit Court Case No. 2013CF1607; and b) in 2014, First was twice convicted of felony bailjumping in Racine County Circuit Court Case Nos. 2014CF717 and 2014CF747.

12. Based on publicly available information, case agents are also aware that First is currently charged in the following cases being prosecuted by the State of Wisconsin in Racine County:

- a. Felony- Bail Jumping (Case No. 2021CF000506);
- b. Misdemeanor- Battery- domestic abuse (Case No. 2021CF000506);
- c. Misdemeanor- Disorderly Conduct- domestic abuse (Case No. 2021CF000506);
- d. Felony- Possess Firearm by a Convicted Felon (Case No. 2021CF000505);
- e. Felony- Bail Jumping 2x (Case No. 2021CF000505);
- f. Felony- Manufacture / Deliver THC (Case No. 2019CF001612);
- g. Felony- Manufacture / Deliver Amphetamine (Case No. 2019CF001612);
- h. Felony- Manufacture / Deliver THC (Case No. 2019CF001612);
- i. Felony- Falsely Present Non Controlled Substance (Case No. 2019CF001612);
- j. Misdemeanor- Battery- Domestic Abuse (Case No. 2019CF000545);
- k. Misdemeanor- Criminal Damage to Property- Domestic Abuse (Case No. 2019CF000545);
- l. Misdemeanor- Disorderly Conduct - Domestic Abuse (Case No. 2019CF000545);
- m. Misdemeanor- Battery- Domestic Abuse (Case No. 2019CF000545);
- n. Misdemeanor- Disorderly Conduct- Domestic Abuse (Case No. 2019CF000545); and
- o. Felony- Stalking- Domestic Abuse (Case No. 2019CF000545)

13. That same day, case agents went to conduct surveillance at Serriah's Beauty Salon, 3500 Kinzie Avenue, Racine, Wisconsin. At about 12:01pm, and about 30 minutes after first receiving information from the CI, case agents observed First getting into the front passenger seat of a red 2016 Ford Explorer, bearing Wisconsin license plate 614-YFF. The vehicle then drove away from the barbershop.

14. Case agents immediately began to conduct a traffic stop of the red Ford Explorer. While stopping the Explorer, case agents observed a Taurus 9mm semi-automatic handgun thrown from the passenger side of the vehicle. The handgun was located against the south curb on Rupert Boulevard near Freres. The vehicle, however, did not stop until it arrived at Rupert Boulevard and Mertens Avenue, approximately 100 feet away.

15. Case agents obtained the handgun from the side of Rupert Boulevard. It was determined to be a Taurus 9mm semi-automatic handgun, Model G2C, bearing serial number TLR98604. The handgun contained a magazine which was loaded with rounds of 9mm ammunition.

16. Case agents approached the vehicle and First was identified as the front seat passenger. A seventeen year-old minor was in the rear passenger seat and D'Asia McCray was the driver of the vehicle. First was found to be in possession of a black Apple Iphone Xr within a clear case and the minor was found to be in possession of a red/black Iphone SE within a black case.

17. After being advised of and waiving his rights, the minor stated that, earlier in the day and pursuant to First's direction, he obtained a handgun from the Ford Explorer and gave it to First inside the barbershop. First kept the gun and had it with him in the truck when they left the barbershop. When police attempted to conduct a traffic stop, First threw the gun out the car window.

18. After obtaining consent to search the minor's phone, case agents located the following text message conversation between the minor and First that began at approximately 11:08a.m. on March 26, 2021:

First- Call me ASAP

First- Bring blick (gun)

First- Dude at the shop lacking (there is a conflict with others at the barbershop)

First- I'm finna come grab you

First- Come out red truck

Minor- Who there

Frist- Rio

Dude that was there with Yoshi & they left

First- I'm finna treat em (fire the gun at them)

Minor- ight

Minor- bet on my way

Frist- Come in sit down until I'm done getting cut if he leave before me get on em

Minor- Bet (Yes)

First- He driving that grey jeep if he try to leave

Minor- Bet (Yes)

First- Way

Minor- Coming in (arriving at 3500 Kinzie Avenue, Racine)

19. Based on their training and experience, and the investigation to date, case agents believe First asked the minor to bring a gun ("bring blick") to the barbershop because First was in conflict with other individuals there. Case agents are aware that "blick" is a street term for a gun.

Based on their training and experience, and the investigation to date, case agents also believe that First was going to use the gun to confront the others ("i'm finna treat em"). Finally, case agents believe that First wanted the minor to confront the individuals if they left before First was finished getting his haircut ("get on em").

IV. CONCLUSION

20. Based on the facts contained within this affidavit, I believe that probable cause exists to believe that in the State and Eastern District of Wisconsin, Akeem First possessed a firearm after being convicted of a felony, in violation of Title 18, United States Code, Section 922(g)(1).